

Karen E. Ford Esq.
SW Ocean Ave & Mission, Suite 208
P.O. Box 287
Carmel-by-the-Sea, California 93921-0287
831-250-6433
Fax 831-250-6844
karen@fordslaw.com
SBN 88358
Attorney for Plaintiff Peter Siegel

**United States District Court
Northern District of California**

Peter Siegel,)	
)	Case No: 5:12-cv-03787 HRL_____
Plaintiff,)	
)	NOTICE OF ERRATA AND
vs.)	CORRECTION TO STIPULATION AND
)	PROPOSED ORDER TO EXTEND CASE
Hewlett-Packard Company,)	MANAGEMENT DEADLINES
)	
Defendant)	

TO THE COURT AND ALL OTHER PARTIES TO THIS ACTION:

PLEASE TAKE NOTICE that Plaintiff Peter Siegel hereby provides notice of errata and correction as follows:

On August 12, 2013, Plaintiff filed a Stipulation and Proposed Order To Extend Case Management Deadlines. There were a number of drafts that were sent back and forth and Plaintiff inadvertently filed a version that still had notation in it from Microsoft Word's Track Changes feature. Plaintiff's counsel has deleted the track changes notes and has corrected the applicable language. A corrected version of the "Stipulation and Proposed Order To Extend Case Management Deadlines" filed on behalf of both parties is attached hereto.

Date: August 12, 2013

/s/
Karen E. Ford Esq.
Attorney for Plaintiff

MORGAN, LEWIS & BOCKIUS LLP
MELINDA S. RIECHERT, (SBN 65504)
mrieichert@morganlewis.com
2 Palo Alto Square
3000 El Camino Real, Suite 700
Palo Alto, CA 94306
Tel: 650.843.4000
Fax: 650.843.4001

MORGAN, LEWIS & BOCKIUS LLP
ADELMISE ROSEME WARNER (SBN 215385)
adelmise.warner@morganlewis.com
One Market, Spear Street Tower
San Francisco, CA 94105-1126
Tel: 415.442.1000
Fax: 415.442.1001

Attorneys for Defendant
HEWLETT-PACKARD COMPANY

Karen E. Ford Esq.
SW Ocean Ave & Mission, Suite 208
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Carmel-by-the-Sea, California 93921-0287
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**United States District Court
Northern District of California**

Peter Siegel,

Plaintiff,

vs.

Hewlett-Packard Company,

Defendant

)
) Case No: 5:12-cv-03787 HRL
)
)

) **STIPULATION AND [PROPOSED]**
) **ORDER TO CONTINUE DEADLINES**
) **SET BY CASE MANAGEMENT ORDER**
)
)
)

STIPULATION TO CONTINUE CASE MANAGEMENT DEADLINES

Pursuant to Local Rules 6-2 and 7-12 the parties, by and through their undersigned counsel, hereby stipulate to entry of an order continuing the fact discovery deadline in this matter from August 13, 2013 until September 30, 2013 for the purpose of allowing the parties to complete depositions currently noticed by the Parties, and the deadline for hearing on motions for summary judgment from October 8, 2013 until December 3, 2013. All other deadlines are to be extended correspondingly. The grounds for seeking this continuance are set out in the Declaration of Counsel filed herewith. The limitation on the scope of discovery during the extension is a limitation placed on the stipulation by Defendant. Plaintiff does not agree that the extended discovery should be limited in any way and reserves all rights in this regard.

Specifically, the parties stipulate as follows:

The fact discovery cutoff in this matter shall be continued until September 30, 2013 for the purpose of allowing the parties to complete depositions currently noticed by the Parties and other discovery already served without prejudice to Plaintiff's right to argue that Plaintiff should be allowed to conduct additional discovery; and

The deadline for hearing on motions for summary judgment other than the currently pending motion shall be continued until December 3, 2013; and

All other case management deadlines after August 1, 2013 including expert discovery and the pretrial conference shall be continued correspondingly.

There have been no previous continuances of any deadline set by the Case Management Order in this matter.

Dated this 12th day of August 2013

/s/

Melinda S. Riechert
Morgan, Lewis & Bockius LLP
Attorney for Defendant
Hewlett-Packard Company

/s/

Karen E. Ford Esq.
Attorney for Plaintiff
Peter Siegel

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED,

The deadlines set out in the case management order in this case are hereby continued as follows:

Fact Discovery Cutoff:_____for the purpose of allowing the parties to complete depositions currently noticed by the Parties and other discovery already served , without prejudice to Plaintiff's right to argue that Plaintiff should be allowed to conduct additional discovery.

Designation of Experts with Reports:_____

Designation of Rebuttal Experts with Reports_____

Expert Discovery Cutoff _____

Last Day for Hearings on Dispositive Motions other than the currently pending motion_____ at 10:00 a.m.

Final Pretrial Conference _____

Dated: _____

HOWARD R. LLOYD
United States Magistrate Judge